



Order Filed on June 4, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

WNI 22-028473
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ATTORNEYS FOR WELLS FARGO BANK, N.A.

In Re:

EVERTON G. RAINFORD AND WINNIFRED A.
RAINFORD,
DEBTORS

Case No.: 19-18863-JKS


Judge: HONORABLE JOHN K.
SHERWOOD

Chapter: 13

**CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF
MODIFIED CHAPTER 13 PLAN**

The relief set forth on the following page is hereby ORDERED.

DATED: June 4, 2022



Honorable John K. Sherwood
United States Bankruptcy Court

This matter being opened to the Court by Herbert B. Raymond, attorney for the Debtor(s), upon filing of a Modified Chapter 13 Plan, and Wells Fargo Bank, N.A., hereinafter "Secured Creditor," by and through its Authorized Agent, LOGS Legal Group LLP, upon the filing of an Objection to Confirmation of Modified Plan, and the parties having subsequently resolving their differences with regard to the Debtors' Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and the Court considered the parties' application for entry of this Consent Order, ~~and for other good cause shown~~, it is hereby ordered:

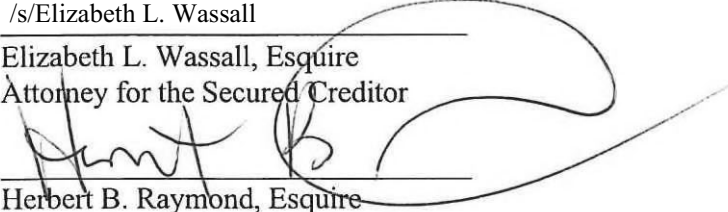
1. Debtor(s) is the mortgagor, and Secured Creditor is the mortgagee, of an agreement secured by real property located at 26 Essex Avenue, Maplewood, NJ 07040.
2. At the time of filing, Debtor(s) owed Secured Creditor a pre-petition arrearage of \$592.95; as evidenced in Secured Creditor's Proof of Claim 4-1 filed on June 25, 2019.
3. Debtor(s) agree to incorporate this amount, \$592.95, into the Chapter 13 Plan to be distributed to Secured Creditor to cure the aforementioned pre-petition default, less any amount(s) as may have already been paid through the Trustee.
4. Debtor(s) agree to maintain all contractually due post-petition payments associated with this mortgage loan, which currently amount to \$592.95 monthly, commencing with the first post-petition payment due of May 17, 2019. Payments to be made directly to: Wells Fargo Home Mortgage P.O. Box 14507 Des Moines IA 50306.
5. If the Debtor(s) fails to make any payments detailed in this Consent Order within sixty (60) days of the date the payments are due, or if any of the funds paid fail to clear for insufficient funds or are dishonored for any reason, then the Secured Creditor may move for an Order Vacating the Automatic Stay as to the Collateral by filing a Motion to Vacate Automatic Stay in the Bankruptcy Court, specifying the Debtor(s)' failure to maintain all contractually due post-petition payments, with a copy of any motion supporting certification(s), and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor(s)' Counsel and Debtor(s) as required by the local bankruptcy rules.
6. Secured Creditor agrees this Consent Order resolves the Objection to Confirmation of Plan filed on May 2, 2022; ECF Doc.:54.
7. This Consent Order is hereby incorporated into Debtor(s)' Modified Chapter 13 Plan and any Order Modifying Chapter 13 Plan as may be entered by the Court.

We hereby consent to the form, content,
and entry of the within Order.

LOGS Legal Group LLP

/s/Elizabeth L. Wassall

Elizabeth L. Wassall, Esquire
Attorney for the Secured Creditor


Herbert B. Raymond, Esquire
Attorney for the Debtor(s)

Date: 5-23-2022

Date: 
5-20-2022